IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

Chapter 11
Case No. 24-11967 (JKS)
(Jointly Administered)
RE: D.I. 1308

CERTIFICATION OF COUNSEL FOR STIPULATION REGARDING RESOLUTION OF MOTION OF CALITEX, LLC AND VANYARMOUTH, LLC FOR ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY

The undersigned counsel to the above-captioned debtors and debtors in possession (the "**Debtors**") hereby certify as follows:

- 1. On December 5, 2024, Calitex, LLC and Vanyarmouth, LLC (the "Movants") filed the Motion of Calitex, LLC and Vanyarmouth, LLC for Order Granting Relief from the Automatic Stay [D.I. 1308] (the "Motion");
- 2. To resolve the Motion, the Parties have agreed to a stipulation (the "Stipulation") to resolve the Motion;
- 3. A copy of the Stipulation is attached as <u>Exhibit A</u> to the proposed form of order (the "**Proposed Order**"), attached hereto as <u>Exhibit 1</u>.
- 4. Counsel for the Debtors and the Movants have reviewed the Proposed Order and have agreed to its entry.

¹ The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit 1**, at its earliest convenience.

Dated: December 12, 2024 Wilmington, Delaware

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